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First Piedmont Rock Quarry/Route 719 Site
"PRP" Committee

May 9, 1991

Mr. Andrew Palestini (3HW24)
Enforcement Project Manager
Remedial Enforcement Section
U. S. Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

RE: First Piedmont Rock Quarry Site
Comments to Proposed Plan

Dear Mr. Palestini:

The PRP Committee has reviewed the proposed plan issued April 10, 1991, by the EPA for the FPRQ site and has the following comments regarding the proposed plan.

The preferred alternative establishes parameters for disposal of the leachate at a POTW and establishes an alternate method of treating the leachate on site if problems are encountered with obtaining acceptance from a POTW. In order to provide flexibility in treatment and disposal of the leachate, we recommend that other options to on-site treatment be considered if the POTW acceptance on the leachate is not obtained.

Examples of options that could be considered: the collection and transportation of the leachate to a state commercial industrial wastewater treatment facility or use of an industrial user for discharge to a POTW. Cost and implementability would have to be taken into consideration prior to final selection of these alternatives.

The EPA should establish a criteria for the termination of leachate collection in order to ensure the cost-effectiveness, implementability and long-term effectiveness of the selected alternative. The monitoring of the leachate should focus on those contaminants detected during the remedial investigation study of the site.

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The proposed plan states, that since tetrachloroethylene was disposed of in the landfill long-term monitoring must include the full range of chemicals listed in the Appendix IX, RCRA Regulations. We recommend that consideration be given to the following in developing a monitoring program:

- 1 - Initial scan of the full range of chemical substances.
- 2 - Periodic monitoring focusing on metals and VOC's.
- 3 - Annual full scan analyses.

Sincerely,



J O Wren
Chairman, PRP Committee

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